UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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YVONNE TINES JONES)	C. A. NO. 05-10082-EFH
Plaintiff)	
)	
Vs.)	
)	
NORMAN Y. MINETA,)	
SECRETARY, U. S. DEPARTMENT)	
OF TRANSPORTATION,)	
And)	
U. S. DEPARTMENT OF TRANSPORTATION)	
Defendants)	

_____)

PLAINTIFF'S ASSENTED TO MOTION TO EXTEND DISCOVERY PERIOD

     Plaintiff Yvonne Tines Jones, through counsel, hereby respectfully requests that the Court extend the discovery period in this action by 90 days, up to and including December 14, 2006. Counsel for Defendant has authorized counsel for Plaintiff to state that Defendant assents to this motion. As grounds for this motion, Plaintiff states as follows:

1. This is an action by a former federal employee alleging discrimination in employment.
2. Discovery in this case is currently scheduled to close on September 15, 2006. A final pretrial conference is scheduled for March 20, 2007.
3. Plaintiff recently retained new counsel in this action. Successor counsel entered his appearance in this case last week, is reviewing the case file he received from Plaintiff, and is still awaiting the files regarding this case held by prior counsel.
4. A discovery extension of 90 days will allow successor counsel to engage in and complete discovery on behalf of Plaintiff in a reasonable and thorough manner.
5. Defendant assents to this motion.

     For all of the foregoing reasons, it is respectfully requested that this motion be granted, and that the time in which the parties may engage in discovery be extended up to and including December 14, 2006.

Yvonne Tines Jones
By her attorney,
Mitchell J. Notis

/s/Mitchell J. Notis

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Mitchell J. Notis
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Brookline, Massachusetts 02445
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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Mitchell J. Notis, counsel for Plaintiff in this action, hereby certify that on July 17, 2006 I conferred with Counsel for Defendant regarding this motion, and that counsel for Defendant authorized me to state that she assents to this motion.

/s/Mitchell J. Notis

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Mitchell J. Notis